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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEVON JOHNSON, individually,

Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT, a political subdivision of the State of Nevada; TAYLOR JOHN WEBB, and CHRISTOPHER HEATON, individually,

Defendants.

CASE NO: 2:19-cv-1817-JCM-NJK

STIPULATION AND
ORDER TO EXTEND BRIEFING
DEADLINES ON DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
(ECF NO. 29)

(First Request)

WHEREAS Defendants Las Vegas Metropolitan Police Department ("LVMPD"), Taylor John Webb, and Christopher Heaton (collectively, the "Defendants") filed their *Motion for Summary Judgment* (ECF No. 29) on September 9, 2020 (the "Motion").

Pursuant to Local Rule IA 6-1(a), the Parties hereby stipulate and agree to extend the deadline for plaintiff to file his Opposition to Defendants' Motion. The current deadline for Plaintiff to respond to Defendants' Motion is **September 30, 2020**. The Parties have agreed that the new deadline for Plaintiff to file an opposition to Defendants' Motion will be **October 14, 2020**. Defendants new deadline to file their reply to plaintiff's response will be **October 28, 2020**.

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Good cause exists for this two-week extension because as a firm of only three (3) attorneys, 1 2 Plaintiff's counsel has competing deadlines in various cases making it nearly impossible to 3 adequately oppose the Defendants' Motion. Plaintiff's counsel has been faced with the preparation 4 and defense of an emergency motion for preliminary injunction, depositions, multiple mediations, a 5 forthcoming arbitration, and extensive motion practice – all of which necessitated this request for an 6 extension of time. This extension is the first request for an extension and is not submitted for the 7 purpose of delay but rather because defendants' motion is extensive, and Plaintiff requires a 8 9 thorough and thoughtful response to allow this Court to decide the Motion fully on the merits. 10 IT IS SO STIPULATED AND AGREED. 11 DATED this 23rd day of September, 2020. DATED this 23rd day of September, 2020. 12 LAGOMARSINO LAW KAEMPFER CROWELL 13 /s/_Andre Lagomarsino /S/RYAN DANIELS 14 Andre M. Lagomarsino, Esq. (#6711) Lyssa Anderson, Esq. (#5781) Daven P. Cameron, Esq. (14179) Ryan Daniels, Esq. (#13094) 15 3005 W. Horizon Ridge Pkwy., #241 1980 Festival Plaza Drive, Suite 650 Henderson, Nevada 89052 Las Vegas, Nevada 89135 16 Attorney for Plaintiff Devon Johnson Attorneys for Defendants LVMPD, Webb and 17 Heaton 18 19 IT IS SO ORDERED. 20 Dellus C. Mahan 21 UNITED STATES DISTRICT COURT JUDGE 22 September 25, 2020 DATED: 23 24 25 26 27 28

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